

FREIWALD LAW

TRIAL LAWYERS

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July 7, 2021

Via Electronic Filing and Electronic Mail

Honorable Eduardo C. Robreno
Senior United States District Judge
15614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

**Re: Doe v. North Penn School District
U.S. District Court for the Eastern District, No. 2:20-cv-05142**

Dear Judge Robreno:

I represent Plaintiff Jane Doe in the above-referenced action. A telephone conference is scheduled with Your Honor for tomorrow, June 8, 2021 at 2:00 p.m. in response to Plaintiff's Motion to Compel Depositions, which was filed on June 25, 2021. Upon discussion with Defendant North Penn School District's counsel today, we jointly propose extending the deadlines in this case by thirty (30) days to allow the parties to complete factual discovery.

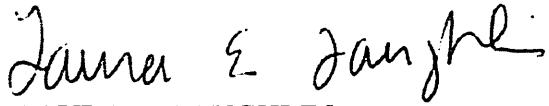
Despite our best efforts, we are unable to complete all of the depositions in this case by August 12, 2021 and would respectfully request an additional thirty (30) days to complete depositions. As Plaintiff's Motion to Compel described, the documents in this case were voluminous and required following up to seek additional documents, service of subpoenas for additional records, and the scheduling of approximately ten (10) depositions. Although some of the depositions are scheduled to be completed by August 12, 2021, due to scheduling conflicts, we are unable to complete all of the depositions within that time.

I have enclosed a proposed revised Case Management Order, which extends the deadlines accordingly. The parties also respectfully request that the Settlement Conference currently scheduled with Judge Sitarski on August 19, 2021 be rescheduled to the week of September 13, 2021 to allow for meaningful settlement discussions upon the close of fact discovery.

Honorable Eduardo C. Robreno
July 7, 2021
Page 2

If Your Honor approves the proposed revised Case Management Order, there will likely be no need for the telephone conference tomorrow. Thank you for your consideration of this request.

Respectfully,



LAURA E. LAUGHLIN

LEL/
Enclosure

cc: Maureen Jordan, Esquire

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANE DOE,)
Plaintiff,)
v.) Civil Action No. 2:20- cv-05142
NORTH PENN SCHOOL DISTRICT,)
Defendant.)

PROPOSED REVISED SCHEDULING ORDER

AND NOW, this _____ day of July, 2021, following an initial pretrial conference with counsel for the parties, and pursuant to Federal Rule of Civil Procedure 16 and Local Rule of Civil Procedure 16.1(b), it is hereby ORDERED that:

1. All attorneys appearing before Judge Robreno must be registered on ECF. All official filings submitted to the Clerk of Court must be filed directly by the attorney on to ECF. All orders, opinions, and other docket entries generated from chambers will likewise be filed directly on to ECF. Notice of these chamber entries will be communicated to counsel either by ECF or ordinary mail.

2. All fact discovery shall be completed by September 10, 2021.
3. Plaintiff's expert reports shall be provided by October 27, 2021.
4. Defendant's expert reports shall be provided by November 29, 2021.
5. Any motions for summary judgment shall be filed by December 29, 2021.

Responses to any motions for summary judgment shall be filed by January 27, 2021.

6. In the event a motion for summary judgment is filed, pre-trial deadlines set forth in the following paragraphs are suspended until further order of the Court.

7. Pretrial memoranda pursuant to Local Rule of Civil Procedure 16.1(c); proposed voir dire questions, jury instructions¹, special interrogatories, and verdict forms for a jury trial (or proposed findings of fact and conclusions of law for a non-jury trial); and any motions *in limine* shall be filed by January 22, 2022. Responses to any motions shall be filed by January 27, 2022.

8. The case shall be placed in the trial pool on February 1, 2022, or, if a motion for summary judgment is filed, 30 days from the disposition of the motion. Once placed in the trial pool, a case may be called to trial upon twenty-four hours' notice to counsel.

9. A notice will issue from Magistrate Judge Sitarski setting a date for a settlement conference after the close of fact discovery.

10. Plaintiff's counsel shall advise the Court promptly of settlement of the case.

AND IT IS SO ORDERED.

Eduardo C. Robreno, J.

¹ Each proposed jury instruction should be numbered, should appear on a separate page, and should include citations to the authorities supporting the proposed instruction.